

Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SUSAN CHEN, et al.,

Plaintiffs,

v.

NATALIE D'AMICO, et al.,

Defendants.

NO. C16-1877 JLR

STIPULATED MOTION AND  
~~[PROPOSED]~~ ORDER TO EXTEND  
DEADLINE FOR AGREED  
PRETRIAL ORDER AND  
PRETRIAL CONFERENCE

NOTE FOR HEARING: 12/20/2019

BY STIPULATION AND AGREEMENT, the Plaintiffs and the Defendants, by and through their respective counsel of record, request the Court extend the deadline for filing the Agreed Pretrial Order and conducting the Pretrial Conference.

1. The Court's Minute Order Setting Trial Date and Related Dates, (Dkt. #102), established Monday, December 23, 2019, as the date for filing the Agreed Pretrial Order and for conducting the Pretrial Conference;

2. The parties have been working diligently toward meeting the deadline for filing the Agreed Pretrial Order and preparing for the Pretrial Conference;

3. Between approximately 3:00 p.m. and 3:40 p.m., today, Friday, December 20, 2019, counsel below received the Court's Order and Amended Order Granting in Part and Denying in Part State Defendants' Motion for Summary Judgment, (Dkt. #242);

STIPULATED MOT. &  
[PROPOSED] ORDER TO  
EXTEND DEADLINE FOR  
AGREED PRETRIAL ORDER AND  
PRETRIAL CONFERENCE  
(C16-1877 JLR)

1           4.     The Court's Order on the State Defendants' Motion for Summary Judgment  
2 dismissed all but the state law negligent investigation claim against DSHS and individual State  
3 Defendant Kimberly Danner;

4           5.     The Court's Order changes the landscape of the case for trial and will require the  
5 parties to rework how they will present their cases, what witnesses and exhibits may be needed to  
6 prosecute and defend the remaining claim, and re-draft the Agreed Pretrial Order;

7           6.     Accordingly, the parties request the Court extend the deadline for the lodging of the  
8 Agreed Pretrial Order and the Pretrial Conference ~~until Friday, December 27, 2019, or such other~~  
9 ~~date as the Court deems reasonable and can accommodate with the Court's schedule.~~ No other  
10 alterations of the case schedule are requested or anticipated to be needed at this time.

11           SIGNED AND STIPULATED TO THIS 20th day of December, 2019.

12           ROBERT W. FERGUSON  
13           Attorney General

DORSEY & WHITNEY LLP

14           s/ Scott M. Barbara  
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*JLR*

~~[PROPOSED]~~ ORDER

IT IS SO ORDERED.

DATED THIS <sup>20</sup>23 day of December 2019.

*James L. Robart*

JAMES L. ROBART

United States District Judge

I hereby declare that on this 20th day of December, 2019, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will also send notification of such filing to the following parties:

Michael D. Myers – [mmyers@myers-company.com](mailto:mmyers@myers-company.com)  
Attorney for Plaintiff Naixiang Lian, individually and as Litigation GAL for L.L.

*s/ Scott M. Barbara*  
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